

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD GREEN, ESQUIRE,	:	<b>CIVIL ACTION NO.: 02-cv-4590</b>
	:	
<i>Plaintiff,</i>	:	
	:	
vs.	:	
	:	
ZURICH AMERICAN INSURANCE	:	
COMPANY,	:	
	:	
<i>Defendant.</i>	:	

**PLAINTIFF'S PROPOSED VOIR DIRE**

1. This case involves allegations that Plaintiff was fired because of his age in violation of state and federal laws.
  - a. Do you hold an opinion either pro or con concerning either the Federal Age Discrimination in Employment Act, or the Pennsylvania Human Relations Act, that would preclude you from rendering a fair and impartial verdict?
2. Have you, or any relatives ever been discharged from a job?
3. Have you or any member of your family or close friends ever been accused of discriminating against another person?
4. Have you or any member of your family ever filed a charge of discrimination with the Equal Employment Opportunity Commission or the Pennsylvania Human Relations Commission?
5. Have you ever, to your knowledge, been named as a respondent or a

defendant in a charge of discrimination filed with the EEOC or the PHRC?

6. Do you now or have you ever supervised others in the workplace?

7. Would any of you tend to give greater weight to the statements or testimony of a witness for the employer, simply because he or she is a witness for the employer?

8. Would any of you have difficulty awarding a large money damages award if the evidence and facts supported such an award?

9. Do any of you believe that younger employees are better than older employees as a general rule?

10. Have you heard or read information or advertising on television, radio, or in the newspapers that deals with the subject of lawsuits generally?

a. As a result, do you have an opinion or belief about lawsuits in general?

b. If so, what is that opinion or belief?

c. Will that influence your judgment in this case so that you may not be able to be fair and impartial?

Respectfully submitted,  
LOVITZ & GOLD, P.C.

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